

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KATIE MILLIO, IRENE JOHNSON,  
JANINE HELLER and TOMAYITA  
STEVENSON,

*Plaintiffs,*

vs.

CASE NUMBER: 04-30130-MAP

WHITMAN EDUCATION GROUP,  
INC., CAREER EDUCATION  
CORPORATION, ULTRASOUND  
DIAGNOSTIC SCHOOL and LOUIS  
GIANELLI,

*Defendants.*

**JOINT MOTION TO MODIFY PRE-TRIAL SCHEDULING ORDER**

Plaintiffs Katie Millio, Irene Johnson, Janine Heller and Tomayita Stevenson and Defendants Whitman Education Group, Inc., Career Education Corporation, Ultrasound Diagnostic School and Louis Giannelli, hereby request that the Court extend the deadlines set forth in the March 10, 2005 Pre-Trial Scheduling Order by 90 days as set forth in the attached Schedule A. The extension is necessary for the following reasons:

1. Discovery currently ends on September 30, 2005.
2. The parties have actively engaged in discovery. Both parties have exchanged document requests and interrogatories. Depositions of key witnesses have begun.
3. Some of the depositions have been continued and rescheduled because of conflicting schedules of counsel and upcoming trials in September.

4. Given counsel's prior commitments and the recent delay in the scheduled depositions, both parties have agreed that an additional 90 days is necessary to complete discovery.


WHEREFORE, the parties respectfully request that: (a) the discovery deadline be extended through and including December 31, 2005; and (b) the Court extend the subsequent deadlines as set forth in the attached Schedule A.

KATIE MILLIO, IRENE JOHNSON,  
JANINE HELLER and TOMAYITA  
STEVENSON

By their attorneys,

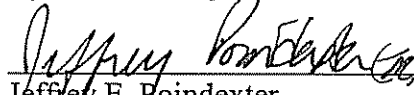
  
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WHITMAN EDUCATION GROUP, INC.,  
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CORPORATION, AND  
ULTRASOUND DIAGNOSTIC SCHOOL

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**SCHEDULE A**

1. All non-expert depositions will be completed by December 31, 2005.
2. Plaintiffs will convey to defendants a report as required by Fed. R. Civ. P. 26(a)(2) regarding any expert whose testimony will be offered at trial, no later than December 31, 2005.
3. Defendants will convey to plaintiffs their Rule 26(a)(2) report no later than January 31, 2006.
4. All expert depositions will be completed and all discovery will close on March 30, 2006.
5. Counsel will appear again before this court for a final pre-trial conference on April 15, 2006 at 2:00 p.m. At least five (5) days prior to the conference, counsel will file final pre-trial memoranda in accordance with the attached order. Please note: failure to file a final pre-trial memorandum as ordered may result in default or dismissal. At this conference, the court will take up the possibility of any further dispositive motions, including a motion for summary judgment.